

DALE M. CENDALI (admitted for all purposes
11/30/93)

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Attorneys for Plaintiffs
The United States Olympic Committee and the
International Olympic Committee

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

The United States Olympic
Committee and The International
Olympic Committee,

Plaintiffs,

v.

Xclusive Leisure & Hospitality Ltd.;
Beijingticketing.com; 2008-
Olympics.com;
Beijingolympic2008tickets.com;
Beijingolympictickets2008.com;
Olympic-tickets.net;
Olympicticketsbeijing2008.com;
Does 1-10, inclusive,

Defendants.

Case No. C 08-03514 JSW

**DECLARATION OF DIANA M.
TORRES IN SUPPORT OF
PLAINTIFFS' MOTION FOR A
TEMPORARY RESTRAINING
ORDER**

1 I, Diana M. Torres, hereby declare as follows:

2
3 1. I am counsel of record for plaintiffs the United States Olympic
4 Committee and the International Olympic Committee. I submit this declaration to
5 provide the Court with exhibits relevant to the questions posed in the Court's July
6 30, 2008, Order. All of the facts set forth herein are known to me personally and, if
7 called as a witness, I could competently testify to them.

8 2. I have personally visited the website www.BeijingTicketing.com (the
9 "Site"). Every page of that site displays the following logo:



15
16 3. The privacy page of the Site, available at
17 <http://www.beijingticketing.com/Privacy.aspx>, begins with the following sentence:

18
19 Welcome to the Official Ticketing Website of the Beijing 2008 Olympic
20 Games (BEIJING TICKETING WEBSITE or the "Website").

21 The Privacy page also has the following Copyright and Trademark notices:

22
23 Copyright Notice:

24 The Beijing Organizing Committee for the Games of the XXIX Olympiad
25 (BOCOG) owns the intellectual property rights to all content on the Website
26 as well as the Website's design, structure, and compilation ("Look and Feel").
27 Unless otherwise stated, Copyright Law of the People's Republic of China
28 and other laws and regulations protect all materials contained in this Website.
The content in this Website is for the purpose of personal use; it may not be
reproduced, distributed, transmitted, displayed, published or broadcast for
any other purpose without prior written permission of BOCOG.

1 Logo and Trademarks:

2 The Olympic Emblem, Trademarks and Technical Terms are registered
3 internationally and are protected under existing laws and regulations.
4 According to existing laws and regulations, it is illegal to use any of the
5 trademarks or service marks or other intellectual property accessible through
6 the Website for any other purposes unless such trademarks or service marks
7 or other intellectual property are provided by BOCOG and are allowed to be
8 used for any other purposes. It is illegal to misrepresent yourself in any way
9 sponsored by, affiliated with, or endorsed by BOCOG or any of BOCOG's
10 Sponsors. It is illegal to defame or disparage BEIJING TICKETING
11 WEBSITE, the trademarks or service marks of BOCOG, or any aspect of the
12 Website.

13 4. There is a portion of the homepage of the Site titled "Facts About
14 Summer Olympic 2008." Under that title are statements preceded by bullet points.
15 In those statements are three links. The first link is the words "Olympics 2008" in
16 the first bullet point; clicking it simply brings the user back to the top of the
17 homepage of the site. The second link is found in the sixth bullet point where it
18 says "calendar for the 2008 Olympic Games" (although the word "games" does not
19 appear to be part of the link) while the third link is in the seventh bullet point at the
20 phrase "2008 Olympic Games." The second and third links both take the user to
21 the "Events and Sports Schedule Beijing Olympics 2008." Attached hereto as
22 **Exhibit A** is a true and correct copy of the homepage of the Site and its Privacy
23 page.

24 5. The "Events and Sports Schedule Beijing Olympics 2008" page lists a
25 calendar in grid form of the events and games at the upcoming Olympic Games in
26 Beijing. Across the top is a list of day and dates while down the left side of the
27 page is a list of the events and sports matches. Within the grid are icons that
28 indicate which events take place on which days. Each of the events and sports
matches listed on the left side of the grid serves as a link to purchase tickets to that
particular type of sports match or event. Each of the icons within the grid serves as
a link to purchase tickets to the particular type of sports match or event on the
specific date indicated on the grid. For example, clicking on the word "Archery"

1 on the left side of the grid brings the user to the purchasing page for the Archery
2 competitions reflected in **Exhibit B** attached hereto, which I printed from the Site
3 on August 3, 2008. And, clicking the icon OP shown on the grid under the date
4 Monday, August 11, 2008, and to the right of the word/link “Archery” (referenced
5 above) brings the user to the purchasing page with the option to purchase tickets to
6 the specific Archery competitions taking place on August 11, 2008, as reflected in
7 **Exhibit C** attached hereto, which I printed from the Site on August 3, 2008. By my
8 count, there are well in excess of 200 links to ticket purchase pages contained on
9 the “Events and Sports Schedule Beijing Olympics 2008” page.

10 6. The official website of the Beijing 2008 Olympic Games can be found
11 at en.Beijing2008.cn. That site can be viewed in several language. On a subpage
12 of the official website, available at <http://www.beijing2008.cn/spirit/beijing2008/>
13 when viewed in Chinese is the following image:



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20 Attached hereto as **Exhibit D** is a true and correct copy of a printout of that
21 subpage from the Chinese language version of the official website of the Beijing
22 2008 Olympic Games. (The printout looks slightly different in terms of the
23 positioning of some of the icons that appears to be due to the conversion from .html
24 to .pdf.)

25 7. Since last Monday, July 27, 2008, I have received many emails from
26 people who have ordered tickets from the Site, BeijingTicketing.com. Those who
27 have contacted me uniformly report that they have not received any tickets from the
28

1 Site. We have submitted declarations from some but not all of those people. Some
2 had already left for Beijing. Many had purchased the tickets from the Site as gifts
3 for family members.

4 8. There is an online discussion group on Topix.com about
5 BeijingTicketing.com at
6 <http://www.topix.com/forum/olympics/T69SBMFUMDO47718A>. Those who have
7 posted comments on the Topix site also report that they have not received tickets.
8 Their comments, like those of the people who have contacted me, reflect feelings of
9 anguish, disbelief, anger and distress.

10 I declare under penalty of perjury under the laws of the United States that the
11 foregoing is true and correct.

12 Executed on this 3rd day of August, 2008 at Los Angeles, California.

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15 /s/ Diana M. Torres
Diana M. Torres
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Please call us at
+44 (0) 207 593 2088
for telephone orders.

Sports

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[Archery Tickets](#)

[Athletics Tickets](#)

[Badminton Tickets](#)

[Baseball Tickets](#)

[Basketball Tickets](#)

[Beach Volleyball Tickets](#)

[Boxing Tickets](#)

[Kayak Flatwater Tickets](#)

[Kayak Slalom Tickets](#)

[Cycling BMX Tickets](#)

[Cycling Mountain Bike Tickets](#)

[Cycling Road Tickets](#)

[Cycling Track Tickets](#)

[Diving Tickets](#)

[Equestrian Tickets](#)

[Fencing Tickets](#)

[Football Tickets](#)

Buy Now!
Opening Ceremony Tickets

[Search Competitions Tickets](#)

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Archery Competition



Sun, 10 Aug 08
Get the Best Archery Tickets
on the Locations The
Archery Competition In
Beijing National Stadium



Badminton Competition



Sat, 09 Aug 08
Get the Best Badminton
Tickets on the Locations on
The Badminton Competition
In Beijing University



Baseball Competition



Wed, 13 Aug 08
Get the Best Baseball
Tickets on the Locations
The Baseball Competition In
XingHua Workers Stadium

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Games :

[Archery Tickets](#)
[Athletics Tickets](#)
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Gymnastics Artistic Tickets**Gymnastics Rhythmic Tickets**
Gymnastics Trampoline Tickets**Handball Tickets****Hockey Tickets****Judo Tickets****Modern Pentathlon Tickets****Rowing Tickets****Sailing Tickets****Shooting Tickets****Softball Tickets****Swimming Tickets****Synchronised Swimming Tickets****Table Tennis Tickets****Taekwondo Tickets****Tennis Tickets****Triathlon Tickets****Volleyball Tickets****Water Polo Tickets****Weightlifting Tickets****Wrestling Tickets****Cities****Beijing Tickets****Qinqdao Tickets****Tianjin Tickets****Shanghai Tickets****Shenyang Tickets****Qinhuangdao Tickets****Hong Kong Tickets****Olympic Venues** **Baseball Tickets** **Basketball Tickets** **Beach Volleyball Tickets** **Boxing Tickets** **Closing Ceremony Tickets** **Cycling BMX Tickets** **Cycling Mountain Bike Tickets** **Cycling Road Tickets** **Cycling Track Tickets** **Diving Tickets** **Gymnastics Artistic Tickets** **Gymnastics Rhythmic Tickets** **Gymnastics Trampoline Tickets** **Handball Tickets** **Hockey Tickets** **Judo Tickets** **Kayak Flatwater Tickets** **Kayak Slalom Tickets** **Modern Pentathlon Tickets** **Opening Ceremony Tickets** **Softball Tickets** **Swimming Tickets** **Synchronised Swimming Tickets** **Table Tennis Tickets** **Taekwondo Tickets** **Tennis Tickets** **Triathlon Tickets** **Volleyball Tickets** **Water Polo Tickets** **Weightlifting Tickets****Hot Selling Olympic Summer Games:**

BeijingTicketing is experienced ticket agent now selling Summer Olympic Tickets which is going to take place in China ([Beijing](#) , [Qinqdao](#) , [Tianjin](#) , [Shanghai](#) , [Shenyang](#) , [Qinhuangdao](#) , [Hong Kong](#)). Browse hundreds of tickets for all sessions of Men's and Women's sports of Olympic Summer Games, sorted by date and can be searched by sport, venue and dates.

Hot Selling Olympic Summer Games:

The Olympic Games is the longest run **athletics competition** in history, and Summer 2008 Olympics tickets are a passport to this rich world of tradition and ceremony. The 2008 **Summer Olympics in Beijing**, China , will be known as the Games of the XXIX Olympiad. The Olympics will be celebrated from August 8, 2008 to August 24, 2008. Buy tickets to Beijing Summer Olympic and see this awesome festival live! Popular games of Olympic are as follows.

Olympic Tickets: [Opening Ceremony Beijing](#)

Olympic Tickets: [Swiming Final Tickets Beijing](#)

Olympic Tickets: [Tennis Singles & Final Tickets Beijing](#)

Olympic Tickets: [Gymnastic Rythmic Tickets Beijing](#)

Olympic Tickets: [Closing Ceremony Beijing](#)

Ticketing Summary:

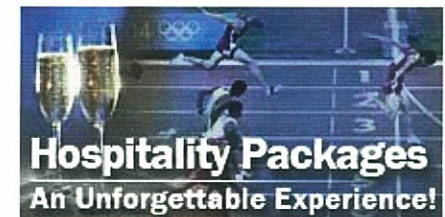
- BeijingTicketing reserve the rights to change timeline dates and prices.
- Ticketing information and **event schedule** are **subject to change on this site**.
- Buying tickets from BeijingTicketing will protect your purchase from frauds.
- We make sure that your Olympic Tickets are guaranteed and secure.
- Browse **Event Calendar** to find your tickets.
- Download printable, easy to use **Event Schedule**

Coming Up Next: Vancouver 2010 Winter Olympic Games

Pricing and ticket information for the Winter Games in Vancouver Canada are currently unavailable as it is not provided by Official Seller. BeijingTicketing is selling tickets for Summer Olympic Games Tickets and will sell tickets for all events at the Winter Games (Olympic 2010), so please check back with our site for up-to-date information, or register with us to get free updates on the Olympic Games.

Facts About Summer Olympic 2008

- BEIJING The head of ticket sales for the **Olympics 2008**
- The sale of 1.85 million tickets, available first-come first-served bases.
- Beijing was elected the host city on July 13 2001 during the 112th Session in Moscow, beating Toronto Paris Istanbul ,and Osaka
- The centerpiece of the 2008 Summer Olympics will be the Beijing National Stadium, nicknamed

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Archery Competition



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Badminton Competition



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Baseball Competition



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The Baseball Competition In
XingHua Workers Stadium

e-mail

Password

Login

Forgot Password

Games :

Archery Tickets
 Athletics Tickets
 Badminton Tickets
 Baseball Tickets
 Basketball Tickets
 Beach Volleyball Tickets
 Boxing Tickets
 Closing Ceremony Tickets
 Cycling BMX Tickets
 Cycling Mountain Bike Tickets
 Cycling Road Tickets
 Cycling Track Tickets
 Diving Tickets

Equestrian Tickets
 Fencing Tickets
 Football Tickets
 Gymnastics Artistic Tickets
 Gymnastics Rhythmic Tickets
 Gymnastics Trampoline Tickets
 Handball Tickets
 Hockey Tickets
 Judo Tickets
 Kayak Flatwater Tickets
 Kayak Slalom Tickets
 Modern Pentathlon Tickets
 Opening Ceremony Tickets

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 Sailing Tickets
 Shooting Tickets
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 Taekwondo Tickets
 Tennis Tickets
 Triathlon Tickets
 Volleyball Tickets
 Water Polo Tickets
 Weightlifting Tickets

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- Beijing was elected the host city on July 13 2001 during the 112th Session in Moscow, beating Toronto Paris Istanbul ,and Osaka
- The centerpiece of the 2008 Summer Olympics will be the Beijing National Stadium, nicknamed the "Bird Nest" because of its nest -like skeletal structure.
- The Beijing municipal authority has declared that more than 70 local laws and decrees would be made before the 2008 Summer Olympics.
- The **calendar for the 2008 Olympic** Games is the most recent version of the games schedule.
- The Main Press Centre (MPC) is the central work place for the 5,600 accredited written and photographic press covering the **2008 Olympic Games**.
- Media Service Guide for accredited media organizations for the Beijing 2008 Paralympic Games is released on the official website of BOCOG.



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Venues

Beijing Institute of Technology Gymnasium
Beijing Shooting Complex
Beijing University of Aeronautics And Astronautics Gymnasium
Beijing University of Technology Gymnasium
Capital Indoor Stadium

Chaoyang Park Beach Volleyball Ground
China Agricultural University Gymnasium
Fencing Hall
Fengtai Softball Field
Hong Kong Equestrian Venue (Beas River)
Hong Kong Equestrian Venue (Shatin)
Laoshan Bicycle Moto Cross (BMX) Venue
Laoshan Mountain Bike Course

Laoshan Velodrome
Modern Pentathlon Venue
National Aquatics Centre
National Indoor Stadium
National Stadium

Olympic Green Archery Field
Olympic Green Hockey Field
Olympic Green Tennis Centre
Olympic Sports Centre Gymnasium
Peking University Gymnasium
Qingdao Olympic Sailing Centre
Qinhuangdao Olympic Sports Centre Stadium
Shanghai Stadium

Shenyang Olympic Sports Centre Stadium
Shunyi Olympic Rowing-Canoeing Park
Tianjin Olympic Centre Stadium

Triathlon Venue
University of Science and Technology Beijing Gymnasium
Cycling Road Course
Workers Indoor Arena
Workers Stadium
Wukesong Baseball Field
Wukesong Indoor Stadium
Ying Tung Natatorium

Beijing 2008 Ticketing is a well known tickets agent and a trusted market place for buyers to find book Olympic tickets. We assure 100 % guaranteed tickets delivery.

Olympic Summer Games - Olympic Finals - Olympic Semi Finals - Olympic Quarter Finals - Olympic Men's Sports - Olympic Women Sports - Olympic Venues



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**Olympic 2008
Schedule**

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THE TICKETING WEBSITE OF BEIJING 2008 OLYMPIC GAMES

GENERAL TERMS AND CONDITIONS OF USE

Introduction:

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This Website is compatible with the browser of Microsoft Internet Explorer (6.x), and may also use the browser of Safari (1.2+) for Firefox (1.5 +) system and for Mac OS system.

The Website is optimized for minimum screen resolution 800 X 600.

Accessibility:

BEIJING TICKETING WEBSITE values web accessibility and is committed to making itself accessible to as many people as possible. The Website's content is designed for client's independence and supports an array of technologies. In its research and design of web pages' content and services, BEIJING TICKETING WEBSITE consulted the

W3C Web Pages' Content Accessibility Guidelines. We are making an effort to comply with as many of these guidelines as possible, so that we can offer a Level A compliant site.

Indemnification:

By using this Website, you agree to indemnify BEIJING TICKETING WEBSITE, its officers, trustees, members, employees, volunteers, agents, and representatives and hold them harmless from any and all claims and expenses, including attorneys' fees, arising from your improper use of the Website. To the maximum extent permitted by laws and regulations, you further agree to irrevocably release BEIJING TICKETING WEBSITE and its officers, trustees, members, employees, volunteers, agents, and representatives from any and all claims, demands, debts, obligations, damages (actual or consequential), costs, and expenses of any kind, (known or unknown, suspected or unsuspected, disclosed or undisclosed) that you may have against them arising out of, or in any way related to, your use of the Website or to any disputes regarding use of ideas or related materials submitted to BEIJING TICKETING WEBSITE.

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Unless otherwise stipulated expressly, all disputes arising from, or in connection with, your use of the Website shall be governed and construed in accordance with the laws of the People's Republic of China. And such disputes shall be resolved through consultation between the parties in the spirit of utmost candor and good faith and in the joint and best interests of the parties. In the event that the parties are unable to resolve such disputes through consultation, such disputes shall be submitted by either party to the jurisdiction of the people's court in the place where BOCOG has its domicile.

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Should you violate these Terms and Conditions or any other rights of XL & H Ltd. trading as BEIJING TICKETING WEBSITE. XL & H Ltd. trading as BEIJING TICKETING WEBSITE reserves the right to pursue any and all legal liabilities against you. If you are aware of any violations of these Terms and Conditions, please report them to us:

Privacy Policy

Your privacy is very important to us. Please read this Privacy Policy to learn about the ways in which we use and protect your personal information. If you have additional questions about BeijingTicketing.com's general privacy principles, please either read the pages at our Privacy Central section available or contact info@beijingticketing.com.

Overview

By accepting this Privacy Policy and the User Agreement, you expressly consent to our use and disclosure of your personal information in the manner prescribed in this Privacy Policy. If you object to this use and disclosure please do not register with us.

This Privacy Policy contains a number of references to other pages on our Site and other websites. Please note: underlined words and phrases are click-through links to these pages and websites. BeijingTicketing.com strongly recommends that you click on such links to obtain further important details about the Privacy Policy, as they may contain further terms and conditions which apply to you as an BeijingTicketing.com member.

This Privacy Policy applies to the <http://www.beijingticketing.com> website (the "Site").

An Important Note about Children.

Our services are not available to children and we ask that persons under the age of 18 do not submit any personal information to us. If you are under 18 years old, you can use this service only in conjunction with and under the supervision of a parent or guardian.

Information We Collect.

Our primary goal in collecting personal information is to provide you with a safe, efficient, and personalised experience.

In general, you can browse the Site without telling us who you are or revealing any personal information about yourself. Once you give us your personal information, you are not anonymous to us. If you choose to use our services, we may require you to provide contact and identity information, financial information and other personal information as indicated on the forms throughout the Site. Where possible, we indicate which fields are required and which fields are optional.

You always have the option not to provide information by choosing not to use a particular service or feature.

Under some circumstances we may require some additional financial information, such as, but not limited to, credit card details if you are registering using an email account at certain email services, or registering to buy tickets from the Site. We use this financial information to help verify your name, address, and other information. We may also use this information to charge you for your use of our services.

We automatically collect and process certain information based upon your use of the Site. We use this information to conduct internal research on our users' demographics, interests, and behaviour to better understand, serve and protect you and our community. This information may include the URL that you just came from (whether this URL is on the Site or not), which URL you next go to (whether this URL is on the Site or not), browser information, and your IP address.

We use data collection devices such as "cookies" on certain pages of the Site. "Cookies" are small files placed on your hard drive that assist us in providing customised services and to help promote safer trading. We also offer certain features that are only available through the use of a cookie. We also use cookies to allow you to enter your password less frequently while you are using the Site. Cookies can also help us provide information which we tailor to your interests. Most cookies are "session cookies", meaning that they are automatically deleted from your hard drive at the end of a session using the Site. You are always free to decline our

cookies if your browser permits, although in that case you may not be able to use certain features on the Site and you may be required to re-enter your password more frequently while you are using the Site.

Additionally, you may encounter "cookies" or other similar devices on certain pages of the Site that are placed by third parties. For example, if you view a web page created by a user, there may be a "cookie" placed within that web page. We do not control the use of cookies by third parties.

If you choose to buy on the Site, we collect information about your buying behaviour.

If you establish a credit account with us to pay the fees we charge, we collect some additional information, including but not limited to a billing address, a credit card number and a credit card expiration date.

If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities or postings on the Site, we may collect such information into a file specific to you.

If you register for BeijingTicketing.com (a) on another web site, or (b) use a web site providing a service for BeijingTicketing.com, or (c) a web site that helps facilitate your activity on BeijingTicketing.com, that web site may provide personal information about you and your transactions back to BeijingTicketing.com.

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We use information in the files we maintain about you, and other information we obtain from your current and past activities on the Site, to resolve disputes, provide customer support, troubleshoot problems and enforce our User Agreement and policies. At times, we may look across multiple users to identify problems or resolve disputes, and in particular we may examine your information to identify users using multiple User IDs or aliases.

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Monday 11-Aug-2008 10:00 - 13:30	Archery Tickets Quarter Finals (AR05)	Men's Team 1/8 Eliminations Men's Team Quarterfinals	Olympic Green Archery Field more details>>	\$175 - A \$150 - B \$125 - C	Order
Monday 11-Aug-2008	Archery Tickets Finals	Men's Team Semifinals Men's Team Bronze Medal Match	Olympic Green Archery Field	\$475 - A \$450 - B	Order

Gymnastics Artistic Tickets	16:00 - 18:20	(AR06)	Men's Team Gold Medal Match	more details>>	\$425 - C	
Gymnastics Rhythmic Tickets			Men's Team Medal Ceremony			
Gymnastics Trampoline Tickets	Tuesday 12-Aug-2008	Archery Tickets Preliminaries (AR07)	Women's Individual 1/32&1/16 Eliminations	Olympic Green Archery Field more details>>	\$175 - A \$150 - B \$125 - C	Order
Handball Tickets	10:00 - 13:10					
Hockey Tickets	Tuesday 12-Aug-2008	Archery Tickets Preliminaries (AR08)	Women's Individual 1/32&1/16 Eliminations	Olympic Green Archery Field more details>>	\$175 - A \$150 - B \$125 - C	Order
Judo Tickets	15:30 - 18:41					
Modern Pentathlon Tickets	Wednesday 13-Aug-2008	Archery Tickets Preliminaries (AR09)	Men's Individual 1/32&1/16 Eliminations	Olympic Green Archery Field more details>>	\$250 - A \$225 - B \$200 - C	Order
Rowing Tickets	10:00 - 13:10					
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Shooting Tickets	15:30 - 18:41					
Softball Tickets	Thursday 14-Aug-2008	Archery Tickets Preliminaries (AR11)	Women's Individual 1/8 Eliminations	Olympic Green Archery Field more details>>	\$375 - A \$325 - B \$275 - C	Order
Swimming Tickets	10:30 - 12:28					
Synchronised Swimming Tickets	Thursday 14-Aug-2008	Archery Tickets Finals (AR12)	Women's Individual Quarterfinals Women's Individual Semifinals Women's Individual Bronze Medal Match Women's Individual Gold Medal Match Women's Individual Medal Ceremony	Olympic Green Archery Field more details>>	\$475 - A \$450 - B \$425 - C	Order
Table Tennis Tickets	16:00 - 18:45					
Taekwondo Tickets						
Tennis Tickets						
Triathlon Tickets						
Volleyball Tickets	Friday 15-Aug-2008	Archery Tickets Preliminaries (AR13)	Men's Individual 1/8 Eliminations	Olympic Green Archery Field more details>>	\$375 - A \$325 - B \$275 - C	Order
Water Polo Tickets	10:30 - 12:29					
Weightlifting Tickets	Friday 15-Aug-2008	Archery Tickets Finals (AR14)	Men's Individual Quarterfinals Men's Individual Semifinals Men's Individual Bronze Medal Match Men's Individual Gold Medal Match Men's Individual Medal Ceremony	Olympic Green Archery Field more details>>	\$475 - A \$450 - B \$425 - C	Order
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